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*Attorneys for Defendant Adam Weinstein*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

**United States of America,**

**Plaintiff,**

**v.**

**Adam Weinstein, et al.**

**Defendants.**

**Cause No.: 2:25-cr-00541-PHX-DJH**

**MOTION TO TRAVEL OUT OF STATE**

**(Expedited Ruling Requested)**

Defendant Adam Weinstein, by and through undersigned counsel, hereby requests the Court to allow international travel to Nogales, Mexico on November 21, 2025 for lunch and to return later that same day. Mr. Weinstein's family and friends have planned a birthday party for him in Nogales, Mexico to attend lunch at La Roca El Balcon Restaurant. It is a family tradition for them to take him to this restaurant every year for his birthday.

Mr. Weinstein has complied with all the rules of pretrial services and has not violated any court orders. Mr. Weinstein does not pose a flight risk and there is no indication that Defendant might pose a flight risk in the future. Defendant is aware of all currently scheduled court appearances and deadlines. He is currently employed in Arizona and is not a threat to the community and poses no flight risk.

1 Mr. Weinstein acknowledges the importance of returning to the jurisdiction and will  
2 comply with any and all conditions imposed by the Court. Mr. Weinstein looks forward to  
3 defending himself against the charges against him, but while the case is pending, he wishes to  
4 spend as many moments as possible with his family and friends.

5 Mr. Weinstein will maintain continuous contact with counsel and Pretrial Services  
6 throughout his travels, ensuring transparency and accountability. He will submit a detailed  
7 itinerary prior to departure if requested, and his travel will not interfere with any court obligations.  
8 Mr. Weinstein also spoke with Sierra J. Cruce at Pretrial Services, and she stated as long as he has  
9 court permission she is fine with his travel plans. Counsel also reached out to the prosecution, Mr.  
10 Rapp, who has no objection to this request.

11 **WHEREFORE**, Mr. Weinstein respectfully requests that this Court grant him permission  
12 for international travel on November 21, 2025.

13 **RESPECTFULLY SUBMITTED** on November 14, 2025.

14 **WILENCHIK & BARTNESS, P.C.**

15 /s/Caitlin B. Fitz-Maurice

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2025, I electronically filed the forgoing document with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all registered CM/ECF participants in this case. I also sent the foregoing document to the following via email as follows:

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/s/ Christine M. Ferreira